

10th May 2005

Re:
FCC Application for Seeley International Pty. Ltd.

Re:	FCC ID R2EELITE
Applicant:	Seeley International Pty. Ltd.
731 Confirmation Number:	EA675214

Subject: R2EELITE corr. no 28887

Dear Mr. Lyles,

The change to the clock frequency was made after my initial investigations into the compliance requirements. Initially, a class II permissive change appeared to be appropriate, and was desired by the manufacturer because it avoided the need to re-label the equipment.

While some components have changed, the equipment still operates in the allowed 433 MHz part of the spectrum and still meets the requirements of 15.231(e). The clock oscillator is not the dominant part of the emissions profile from the equipment.

When the equipment was presented for testing, I did not re-visit part 2 because the decision to completely re-test the transmitter had already been made (the antenna track change alone justified this).

Advice from the FCC (24th Dec. 2004), (admittedly, without knowledge of the impending clock frequency change) is reproduced below for your reference; this drove my supposition that a class II permissive change was the appropriate way to address the new antenna track layout. I offer this as an explanation for seeking a permissive change even though (as I now realize on revisiting part 2) 2.1043 clearly states that a new grant is required if the clock rate changes.

I hope you can help us through this oversight and I look forward to your reply.

received 24-12-04:

Inquiry:

our laboratory performed tests and the certification application on a short range Part 15 transmitter. They have informed us of planned design changes that will require re-testing. Are we able to have the certification modified to reflect the new design, but retain the existing FCC ID (R2EELITE)? Wishing you a safe and happy Christmas and New Year. Paul Kay EMC Manager Austest Laboratories SA U3, No. 4 Aristotle Close Golden Grove SA 5125 ph. +61 8 8288 7400 fx. +61 8 8288 7411

Response:

Since the FCCID (R2EELITE) has already been granted for several months, any modifications to the device will require that a Class I or Class II Permissive Change be applied for. If the changes made are not in the RF generating circuitry and the RF emission levels are not degraded, then it may be possible to file as a Class I Permissive Change. However, if the emission levels are degraded but still compliant, then a Class II Permissive Change is required. In either case, you may retain the original FCCID number.

Best Regards,

A handwritten signature in blue ink, appearing to read "Paul Kay".

Paul Kay
EMC Manager
Austest Laboratories Adelaide, South Australia